

MESSAGE NO: 4110112 MESSAGE DATE: 04/20/1994

MESSAGE STATUS: Active CATEGORY: Antidumping  
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SUB-TYPE:

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REFERENCE 3232113  
MESSAGE #  
(s):

CASE #(s): A-427-808, A-428-815

EFFECTIVE DATE: COURT CASE #:

PERIOD OF REVIEW: TO

PERIOD COVERED: 04/20/1994 TO

Notice of Lifting of Suspension Date:

TO: { Directors Of Field Operations, Port Directors }

FROM: { Director AD/CVD & Revenue Policy & Programs }

RE: CLARIFICATION OF ANTIDUMPING DUTY ORDERS ON CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM VARIOUS COUNTRIES

MESSAGE NO: 4110112

DATE: 04 20 1994

CATEGORY: ADA

TYPE: ORD

REFERENCE: 3232113

REFERENCE DATE: 08 20 1993

CASES: A - 427 - 808

A - 428 - 815

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- - - -

PERIOD COVERED: 04 20 1994 TO

LIQ SUSPENSION DATE:

TO: REGIONAL DIRECTORS, COMMERCIAL OPERATIONS  
DISTRICT DIRECTORS, AREA AND PORT DIRECTORS

FROM: DIRECTOR, TRADE COMPLIANCE DIVISION

RE: CLARIFICATION OF ANTIDUMPING DUTY ORDERS ON CERTAIN  
CORROSION-RESISTANT CARBON STEEL FLAT  
PRODUCTS FROM VARIOUS COUNTRIES

1. THIS IS A CLARIFICATION OF E-MAIL MESSAGE 3232113 DATED  
08/20/93. PARAGRAPHS 5-13 ARE FOR CLARIFICATION PURPOSES.

THE DEPARTMENT OF COMMERCE PUBLISHED IN THE FEDERAL REGISTER ON  
AUGUST 19, 1993, NOTICES OF ITS ANTIDUMPING DUTY ORDERS AND  
AMENDMENTS TO FINAL DETERMINATIONS OF SALES AT LESS THAN FAIR  
VALUE OF CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS,

2. ONE OF THE FOUR CLASSES OR KINDS OF PRODUCTS COVERED BY THESE INVESTIGATIONS IS CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS. THESE PRODUCTS INCLUDE FLAT-ROLLED CARBON STEEL PRODUCTS, OF RECTANGULAR SHAPE, EITHER CLAD, PLATED OR COATED WITH CORROSION-RESISTANT METALS SUCH AS ZINC, ALUMINUM, OR ZINC-, ALUMINUM-, NICKEL- OR IRON-BASED ALLOYS, WHETHER OR NOT CORRUGATED OR PAINTED, VARNISHED OR COATED WITH PLASTICS OR OTHER NONMETALLIC SUBSTANCES, IN ADDITION TO THE METALLIC COATING, IN COILS, (WHETHER OR NOT IN SUCCESSIVELY SUPERIMPOSED LAYERS) AND OF A WIDTH OF 0.5 INCH OR GREATER, OR IN STRAIGHT LENGTHS WHICH, IF OF A THICKNESS LESS THAN 4.75 MILLIMETERS ARE OF A WIDTH OF 0.5 INCH OR GREATER AND WHICH MEASURES AT LEAST 10 TIMES THE THICKNESS OR IF OF A THICKNESS OF 4.75 MILLIMETERS OR MORE ARE OF A WIDTH WHICH EXCEEDS 150 MILLIMETERS AND MEASURES AT LEAST TWICE THE THICKNESS, AS CURRENTLY CLASSIFIABLE IN THE HTS UNDER ITEM NUMBERS

7210.31.0000, 7210.39.0000, 7210.41.0000, 7210.49.0030, 7210.49.0090, 7210.60.0000, 7210.70.6030, 7210.70.6060, 7210.70.6090, 7210.90.1000, 7210.90.6000, 7210.90.9000, 7212.21.0000, 7212.29.0000, 7212.30.1030, 7212.30.1090, 7212.30.3000, 7212.30.5000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7212.60.0000, 7215.90.1000, 7215.90.5000, 7217.12.1000, 7217.13.1000, 7217.19.1000, 7217.19.5000, 7217.22.5000, 7217.23.5000, 7217.29.1000, 7217.29.5000, 7217.32.5000, 7217.33.5000, 7217.39.1000, AND 7217.39.5000.

INCLUDED IN THESE INVESTIGATIONS ARE FLAT-ROLLED PRODUCTS OF NONRECTANGULAR CROSS-SECTION WHERE SUCH CROSS-SECTION IS ACHIEVED

SUBSEQUENT TO THE ROLLING PROCESS (I.E., PRODUCTS WHICH HAVE BEEN "WORKED AFTER ROLLING") -- FOR EXAMPLE, PRODUCTS WHICH HAVE BEEN BEVELLED OR ROUNDED AT THE EDGES.

EXCLUDED FROM THESE INVESTIGATIONS ARE FLAT-ROLLED STEEL PRODUCTS EITHER PLATED OR COATED WITH TIN, LEAD, CHROMIUM, CHROMIUM OXIDES, BOTH TIN AND LEAD ("TERNE PLATE"), OR BOTH CHROMIUM AND CHROMIUM OXIDES ("TIN-FREE STEEL"), WHETHER OR NOT PAINTED,

VARNISHED OR COATED WITH PLASTICS OR OTHER NONMETALLIC SUBSTANCES

IN ADDITION TO THE METALLIC COATING. ALSO EXCLUDED FROM THESE INVESTIGATIONS ARE CLAD PRODUCTS IN STRAIGHT LENGTHS OF 0.1875 INCH OR MORE IN COMPOSITE THICKNESS AND OF A WIDTH WHICH EXCEEDS 150 MILLIMETERS AND MEASURES AT LEAST TWICE THE THICKNESS. ALSO EXCLUDED FORM THESE INVESTIGATIONS ARE CERTAIN CLAD STAINLESS FLAT-ROLLED PRODUCTS, WHICH ARE THREE LAYERED CORROSION-RESISTANT

CARBON STEEL FLAT-ROLLED PRODUCTS LESS THAN 4.75 MILLIMETERS IN COMPOSITE THICKNESS THAT CONSIST OF A CARBON STEEL FLAT-ROLLED PRODUCT CLAD ON BOTH SIDES WITH STAINLESS STEEL IN A 20%-60%-20% RATIO.

ALTHOUGH THE HTS SUBHEADINGS ARE PROVIDED FOR CONVENIENCE AND CUSTOMS PURPOSES, THE WRITTEN DESCRIPTION OF THE SCOPE OF THESE PROCEEDINGS IS DISPOSITIVE.

3. FOR FURTHER REPORTING PURPOSES, THESE CASES HAVE BEEN ASSIGNED THE FOLLOWING INVESTIGATIONS NUMBERS:

FRANCE	A-427-808	GERMANY	A-428-815
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4. THE INTERNATIONAL TRADE COMMISSION (ITC) NOTIFIED THE DEPARTMENT THAT IMPORTS OF CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM FRANCE AND GERMANY MATERIALLY INJURE THE

U.S. INDUSTRY. THEREFORE, THE CUSTOMS SERVICE SHALL CONTINUE TO SUSPEND LIQUIDATION OF ALL EXPORTS OF CERTAIN CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS FROM FRANCE AND GERMANY, THAT ARE ENTERED OR WITHDRAWN FROM WAREHOUSE, FOR CONSUMPTION ON OR AFTER

FEBRUARY 4,1993, AND SHALL REQUIRE A CASH DEPOSIT EQUAL TO THE ESTIMATED MARGIN PERCENTAGES LISTED BELOW:

MFR/PROD EXPORTER	CUSTOMS ID NUMBER	MARGIN PERCENTAGE
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FRANCE

USINOR	A-427-808-001	39.40
ALL OTHERS	A-427-808-000	39.40

GERMANY

THYSSEN	A-428-815-003	4.18
ALL OTHERS	A-428-815-000	4.18

5. FOR DEPARTMENT PURPOSES, THE COUNTRY OF ORIGIN OF MERCHANDISE SUBJECT TO THESE ORDERS MAY BE DIFFERENT FROM THE COUNTRY OF ORIGIN AS DETERMINED BY CUSTOMS UNDER THE FOLLOWING SCENARIO: STEEL IS MANUFACTURED IN ONE COUNTRY, AND THEN, IN ANOTHER COUNTRY, UNDERGOES FURTHER PROCESSING WHICH RESULTS IN A CHANGE

IN CLASS OR KIND. IN SUCH CASES, THE DEPARTMENT ALWAYS CONSIDERS THE STEEL TO BE SUBSTANTIALLY TRANSFORMED, AND THE COUNTRY OF ORIGIN FOR PURPOSES OF DETERMINING THE CORRECT ANTIDUMPING DUTY DEPOSIT RATE TO BE THE COUNTRY WHERE THE FURTHER PROCESSING TAKES PLACE.

HOWEVER, SUCH FURTHER PROCESSING, WHICH THE DEPARTMENT ALWAYS CONSIDERS A SUBSTANTIAL TRANSFORMATION, IS NOT ALWAYS CONSIDERED A SUBSTANTIAL TRANSFORMATION BY CUSTOMS. THEREFORE, THE DEPARTMENT AND CUSTOMS COULD HAVE TWO DIFFERENT COUNTRY OF ORIGIN

DESIGNATIONS. (FOR EXAMPLE, IF A RESELLER PURCHASES A COIL OF HOT-ROLLED CARBON STEEL AND GALVANIZES IT, THE DEPARTMENT WOULD CONSIDER THAT A SUBSTANTIAL TRANSFORMATION FOR ANTIDUMPING PURPOSES, BUT DEPENDING ON THE METALLURGICAL CHANGES THE GALVANIZING PRODUCED, CUSTOMS MIGHT NOT.)

THE FOLLOWING IS THE FORMAT FOR CUSTOMS IDENTIFICATION NUMBERS FOR STEEL THAT ORIGINATES IN ONE COUNTRY (INCLUDING THE U.S.) AND IS FURTHER PROCESSED IN ANOTHER COUNTRY SUCH THAT THE PRODUCT IS CHANGED TO ANOTHER CLASS OR KIND -- AND UNDERGOES A SUBSTANTIAL TRANSFORMATION FOR ANTIDUMPING PURPOSES BUT NOT FOR CUSTOMS PURPOSES -- BEFORE (RE)ENTERING THE U.S. (SEE PARAGRAPH 8 BELOW

FOR FURTHER INSTRUCTIONS.):

A-XXX-YYY-ZZZ

A EQUALS ANTIDUMPING

XXX EQUALS THE COUNTRY OF ORIGIN, AS DETERMINED BY CUSTOMS.

YYY EQUALS THE CODE OF THE PRODUCT AS IT ENTERS THE U.S., I.E.,  
REFLECTING ANY FURTHER PROCESSING DONE. FOR THESE  
"THIRD COUNTRY" PRODUCTS,

"107" WILL ALWAYS INDICATE COLD-ROLLED CARBON STEEL,

"108" WILL ALWAYS INDICATE CORROSION-RESISTANT CARBON STEEL,  
AND

"109" WILL ALWAYS INDICATE CUT-TO-LENGTH CARBON STEEL PLATE.

ZZZ EQUALS THE UNIQUE COMPANY CODE WHICH CORRESPONDS TO THE  
COMPANY THAT SUBSTANTIALLY TRANSFORMED THAT PRODUCT.

6. THEREFORE, CUSTOMS SHALL CONTINUE TO SUSPEND LIQUIDATION OF  
ALL CARBON STEEL FLAT PRODUCTS THAT ARE GALVANIZED OR COATED WITH  
ANOTHER CORROSION-RESISTANT METAL OR ALLOY IN FRANCE AND GERMANY,

REGARDLESS OF ITS CUSTOMS COUNTRY OF ORIGIN, THAT IS ENTERED, OR  
WITHDRAWN FROM WAREHOUSE, FOR CONSUMPTION, ON OR AFTER  
FEBRUARY 4, 1993, AND SHALL REQUIRE A CASH DEPOSIT EQUAL TO  
THE ESTIMATED FINAL MARGINS LISTED BELOW:

CORROSION-RESISTANT CARBON STEEL FLAT PRODUCTS - ANTIDUMPING

CUSTOMS COUNTRY OF ORIGIN

MANUFACTURER/PRODUCER	CUSTOMS ID	MARGIN
EXPORTER	NUMBER	PERCENTAGE

## ARGENTINA

DOFASCO INC. (CANADA)	A-357-108-001	10.89
STELCO INC. (CANADA)	A-357-108-003	28.27
ALL OTHERS (CANADA)	A-357-108-020	22.29

## AUSTRALIA

DOFASCO INC. (CANADA)	A-602-108-001	10.89
STELCO INC. (CANADA)	A-602-108-003	28.27
ALL OTHERS (CANADA)	A-602-108-020	22.29

## AUSTRIA

DOFASCO INC. (CANADA)	A-433-108-001	10.89
STELCO INC. (CANADA)	A-433-108-003	28.27
ALL OTHERS (CANADA)	A-433-108-020	22.29

## BELGIUM

DOFASCO INC. (CANADA)	A-423-108-001	10.89
STELCO INC. (CANADA)	A-423-108-003	28.27
ALL OTHERS (CANADA)	A-423-108-020	22.29

## BRAZIL

DOFASCO INC. (CANADA)	A-351-108-001	10.89
STELCO INC. (CANADA)	A-351-108-003	28.27
ALL OTHERS (CANADA)	A-351-108-020	22.29

## FINLAND

DOFASCO INC. (CANADA)	A-405-108-001	10.89
STELCO INC.(CANADA)	A-405-108-003	28.27
ALL OTHERS (CANADA)	A-405-108-020	22.29

## FRANCE

DOFASCO INC. (CANADA)	A-427-108-001	10.89
STELCO INC. (CANADA)	A-427-108-003	28.27
ALL OTHERS (CANADA)	A-427-108-020	22.29

#### GERMANY

DOFASCO INC. (CANADA)	A-428-108-001	10.89
STELCO INC. (CANADA)	A-428-108-003	28.27
ALL OTHERS (CANADA)	A-428-108-020	22.29

#### ITALY

DOFASCO INC. (CANADA)	A-475-108-001	10.89
STELCO INC. (CANADA)	A-475-108-003	28.27
ALL OTHERS (CANADA)	A-475-108-020	22.29

#### JAPAN

DOFASCO INC. (CANADA)	A-588-108-001	10.89
STELCO INC. (CANADA)	A-588-108-003	28.27
ALL OTHERS (CANADA)	A-588-108-020	22.29

#### KOREA, REPUBLIC OF

DOFASCO INC. (CANADA)	A-580-108-001	10.89
STELCO INC. (CANADA)	A-580-108-003	28.27
ALL OTHERS (CANADA)	A-580-108-020	22.29

#### MEXICO

DOFASCO INC. (CANADA)	A-201-108-001	10.89
STELCO INC. (CANADA)	A-201-108-003	28.27
ALL OTHERS (CANADA)	A-201-108-020	22.29

#### NETHERLANDS

DOFASCO INC.(CANADA)	A-421-108-001	10.89
STELCO INC. (CANADA)	A-421-108-003	28.27



ALL OTHERS (CANADA)	A-421-108-020	22.29
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NEW ZEALAND

DOFASCO INC. (CANADA)	A-614-108-001	10.89
STELCO INC. (CANADA)	A-614-108-003	28.27
ALL OTHERS (CANADA)	A-614-108-020	22.29

POLAND

DOFASCO INC. (CANADA)	A-455-108-001	10.89
STELCO INC. (CANADA)	A-455-108-003	28.27
ALL OTHERS (CANADA)	A-455-108-020	22.29

ROMANIA

DOFASCO INC. (CANADA)	A-485-108-001	10.89
STELCO INC. (CANADA)	A-485-108-003	28.27
ALL OTHERS (CANADA)	A-485-108-020	22.29

SPAIN

DOFASCO INC. (CANADA)	A-470-108-001	10.89
STELCO INC. (CANADA)	A-470-108-003	28.27
ALL OTHERS (CANADA)	A-470-108-020	22.29

SWEDEN

DOFASCO INC. (CANADA)	A-401-108-001	10.89
STELCO INC. (CANADA)	A-401-108-003	28.27
ALL OTHERS (CANADA)	A-401-108-020	22.29

UNITED KINGDOM

DOFASCO INC. (CANADA)	A-412-108-001	10.89
STELCO INC. (CANADA)	A-412-108-003	28.27
ALL OTHERS (CANADA)	A-412-108-020	22.29

## UNITED STATES

DOFASCO INC. (CANADA)	A-100-108-001	10.89
STELCO INC. (CANADA)	A-100-108-003	28.27
ALL OTHERS (CANADA)	A-100-108-020	22.29

### NOTE:

THE PRECEDING LIST IS NOT EXHAUSTIVE. SHOULD A CUSTOMS OFFICER PROCESS AN ENTRY FOR A COMBINATION NOT LISTED ABOVE, OR IF THERE ANY OTHER QUESTIONS REGARDING THIS MATTER BY CUSTOMS OFFICERS, PLEASE CONTACT VIA E-MAIL, THROUGH THE REGIONAL ANTIDUMPING/COUNTERVAILING DUTY COORDINATOR, THE TRADE COMPLIANCE DIVISION, ANTIDUMPING/COUNTERVAILING DUTY BRANCH, USING ATTRIBUTE "HQ OAB." OTHER INTERESTED PARTIES SHOULD CONTACT EDWARD YANG OR RICHARD WEIBLE, OFFICE OF AGREEMENTS COMPLIANCE, IMPORT ADMINISTRATION, INTERNATIONAL TRADE ADMINISTRATION, U.S. DEPARTMENT OF COMMERCE AT (202) 482-3793.

7. IN GENERAL, THE DEPOSIT RATE REQUIRED ON EACH ENTRY WILL BE THAT ASSIGNED TO THE MANUFACTURER OF THE FLAT-ROLLED STEEL PRODUCT. FOR AN ENTRY TO BE ACCEPTED, THE NAME OF THE MANUFACTURER MUST BE CLEARLY IDENTIFIED.

8. IN THE EVENT THAT THE EXPORTER IS NOT THE MANUFACTURER (E.G., THE EXPORTER IS A RESELLER, TRADING COMPANY, OR STEEL SERVICE CENTER), THESE INSTRUCTIONS SHOULD BE FOLLOWED:

A. IF THE EXPORTER AND THE MANUFACTURER ARE IN THE SAME COUNTRY, AND THAT COUNTRY IS SUBJECT TO THESE ORDERS, THE PROCEDURE SHOULD

BE AS FOLLOWS:

1. IF THE UNRELATED EXPORTER PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER, THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

2. IF THE THE UNRELATED EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

3. IF THE UNRELATED EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED CARBON STEEL AND GALVANIZES IT -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE EXPORTER OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE EXPORTER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

NOTE:

IN THE EVENT THAT THE EXPORTER IS RELATED TO THE MANUFACTURER, THEN A DEPOSIT EQUAL TO THE RATE ASSIGNED TO THE MANUFACTURER WILL BE REQUIRED. THE CORRECT RATE WILL BE THAT FOR THE CLASS OR KIND TO WHICH THE PRODUCT BELONGS AT THE TIME THAT IT IS ENTERED, OR WITHDRAWN FROM WAREHOUSE, FOR CONSUMPTION. IF THE EXPORTER HAS FURTHER PROCESSED THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER, AND IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT, THE "ALL OTHERS" RATE WILL APPLY.

B. IF THE EXPORTER IS IN ONE SUBJECT COUNTRY AND THE MANUFACTURER IS IN A DIFFERENT SUBJECT COUNTRY, THE PROCEDURE

SHOULD BE AS FOLLOWS:

1. IF THE EXPORTER PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER, THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

2. IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

3. IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL AND GALVANIZES IT -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE EXPORTER OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE EXPORTER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

C. IF THE EXPORTER IS IN A COUNTRY SUBJECT TO THESE ORDERS, BUT THE MANUFACTURER IS NOT, THE PROCEDURE SHOULD BE AS FOLLOWS:

1. IF THE EXPORTER IN A COUNTRY SUBJECT TO THESE ORDERS PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER IN A COUNTRY NOT SUBJECT TO THESE ORDERS (INCLUDING THE U.S.), NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

2. IF THE EXPORTER IN A COUNTRY SUBJECT TO THESE ORDERS FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER IN A COUNTRY NOT SUBJECT TO THESE ORDERS (INCLUDING THE U.S.) -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

3. IF THE EXPORTER IN A COUNTRY SUBJECT TO THESE ORDERS FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER IN A COUNTRY NOT SUBJECT TO THESE ORDERS (INCLUDING THE U.S.) -- E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL AND GALVANIZES IT -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE EXPORTER OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE EXPORTER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

D. IF THE EXPORTER IS NOT IN A COUNTRY SUBJECT TO THESE ORDERS, BUT THE MANUFACTURER IS, THE PROCEDURE SHOULD BE AS FOLLOWS:

1. IF THE EXPORTER PERFORMS NO FURTHER PROCESSING BUT SIMPLY RESELLS THE FLAT-ROLLED STEEL PRODUCT WHICH IT PURCHASED FROM THE MANUFACTURER, THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

2. IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, BUT DOES NOT TRANSFORM IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER -- E.G., IF AN EXPORTER PURCHASES A FOUR-FOOT WIDE COIL OF CORROSION-RESISTANT CARBON STEEL AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON

STEEL -- THE DEPOSIT REQUIRED WILL BE EQUAL TO THAT OF THE MANUFACTURER IN THE COUNTRY OF MANUFACTURE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT.

3. IF THE EXPORTER FURTHER PROCESSES THE FLAT-ROLLED STEEL PRODUCT, THUS TRANSFORMING IT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT PURCHASED FROM THE MANUFACTURER --E.G., IF AN EXPORTER PURCHASES A COIL OF HOT-ROLLED STEEL AND GALVANIZES IT -- NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

9. IF MERCHANDISE ENTERED UNDER 9802.00.60 (AMERICAN GOODS RETURNED), HAS BEEN TRANSFORMED INTO A CLASS OR KIND OF MERCHANDISE SUBJECT TO THESE ORDERS IN A COUNTRY SUBJECT TO THESE ORDERS, A DEPOSIT ON THE FULL VALUE OF THE PRODUCT WILL BE REQUIRED. THIS DEPOSIT WILL BE EQUAL TO THE FOREIGN MANUFACTURER'S ASSIGNED RATE, OR THE "ALL OTHERS" RATE IF THE MANUFACTURER HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

10. FOR THE PURPOSES OF ANTIDUMPING AND COUNTERVAILING DUTIES, GALVANIZING CONSTITUTES SUBSTANTIAL TRANSFORMATION (E.G., U.S. ORIGIN STEEL PLATE GALVANIZED IN ANOTHER COUNTRY IS SUBJECT TO THE AD VALOREM CASH DEPOSIT FOR CORROSION-RESISTANT STEEL FROM THE SUBJECT COUNTRY).

11. MERCHANDISE IS "TOLLED" WHEN THE ORIGINAL MANUFACTURER HAS THE MERCHANDISE FURTHER PROCESSED BY ANOTHER COMPANY WHILE RETAINING TITLE TO, OR OWNERSHIP OF, THE MERCHANDISE. U.S. ORIGIN MERCHANDISE WHICH IS TOLLED IN A COUNTRY SUBJECT TO THESE ORDERS WILL BE TREATED IN THE FOLLOWING MANNER:

A. FOR U.S. ORIGIN MERCHANDISE WHICH IS TOLLED IN A COUNTRY SUBJECT TO THESE ORDERS, BUT FOR WHICH THE TOLLING PROCESS DOES NOT TRANSFORM THE PRODUCT INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT RECEIVED FROM THE U.S. MANUFACTURER -- E.G., IF A FOREIGN "TOLLER" IMPORTS A

FOUR-FOOT WIDE COIL OF CORROSION-RESISTANT CARBON STEEL FROM THE U.S. AND SLITS IT INTO FOUR, ONE-FOOT WIDE COILS OF CORROSION-RESISTANT CARBON STEEL -- NO DEPOSIT AND NO SUSPENSION WILL BE REQUIRED.

B. FOR U.S. ORIGIN MERCHANDISE WHICH IS TOLLED IN A COUNTRY SUBJECT TO THESE ORDERS AND FOR WHICH THE TOLLING PROCESS DOES TRANSFORM THE MERCHANDISE INTO A CLASS OR KIND OF MERCHANDISE DIFFERENT FROM THAT RECEIVED FROM THE U.S. MANUFACTURER --E.G., IF A FOREIGN "TOLLER" IMPORTS FROM THE U.S. A COIL OF HOT-ROLLED STEEL AND GALVANIZES IT -- THE DEPOSIT REQUIRED WILL BE ON THE FULL VALUE OF THE NEW PRODUCT AND WILL BE EQUAL TO THAT OF THE "TOLLER" OF THE NEW PRODUCT, OR THE "ALL OTHERS" RATE IF THE "TOLLER" HAS NO RATE ASSIGNED SPECIFICALLY TO IT FOR THIS NEW PRODUCT.

12. IN THE CASE OF CORROSION-RESISTANT SUBJECT MERCHANDISE FROM DNN, A CANADIAN GALVANIZER OF STEEL PRODUCTS WHICH IS RELATED TO DOFASCO, A DEPOSIT IS REQUIRED EQUAL TO DOFASCO'S ESTIMATED MARGIN OF DUMPING, 10.89 PERCENT, ON THE FULL VALUE OF DNN MERCHANDISE.

13. IN THE CASE OF CORROSION-RESISTANT SUBJECT MERCHANDISE FROM SOREVCO, INC., A RELATED PARTY TO DOFASCO, A DEPOSIT IS REQUIRED EQUAL TO DOFASCO'S ESTIMATED MARGIN OF DUMPING, 10.89 PERCENT, ON THE FULL VALUE OF SOREVCO MERCHANDISE.

14. IF THERE ARE ANY QUESTIONS REGARDING THIS MATTER BY CUSTOMS OFFICERS, PLEASE CONTACT VIA E-MAIL, THROUGH THE REGIONAL ANTIDUMPING/COUNTERVAILING DUTY COORDINATOR, THE TRADE COMPLIANCE

DIVISION, ANTIDUMPING/COUNTERVAILING DUTY BRANCH, USING ATTRIBUTE "HQ OAB." OTHER INTERESTED PARTIES SHOULD CONTACT EDWARD YANG OR RICHARD WEIBLE, OFFICE OF AGREEMENTS COMPLIANCE, IMPORT ADMINISTRATION, INTERNATIONAL TRADE ADMINISTRATION, U.S. DEPARTMENT OF COMMERCE AT (202) 482-3793.

15. THERE ARE NO RESTRICTIONS ON THE RELEASE OF THIS INFORMATION.

NANCY MCTIERNAN



## Company Details

\*Party Indicator Value:

I = Importer, M = Manufacturer, E = Exporter, S = Sold To Party